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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

PATRICIA GARCIA and ANTHONY  
GARCIA, individually and as successors-  
in-interest to Tony Garcia, deceased,

Plaintiffs,

v.

MARK FRANKE, LARRS C. JOHNSON,  
WILLIAM HUTTON, DEAN WORTHY  
GERARDO CRUZ, ROBERT  
DELACRUZ, ALBERT RAMIREZ,  
JASON CANTRALL, JESSICA  
TEETSEL, MICHELLE VENEGAS,  
GRANT TOROSSIAN, MARCO BORJA,  
CHARLES GRAY and KEVIN  
CASTANEDA, COUNTY OF  
VENTURA, and DOES 1-10, inclusive,

Defendants.

Case No. 2:25-cv-06698-SRM-MAR

*Hon. Serena R. Murillo*

**NOTICE OF SETTLEMENT**

**TO THE HONORABLE COURT:**

Plaintiffs PATRICIA GARCIA and ANTHONY GARCIA (hereafter referred to collectively as “Plaintiffs”), by and through their counsel of record, hereby inform the court of the parties’ settlement of this entire matter.

As of the date of this filing, the parties have fully executed a settlement agreement, and Plaintiffs are awaiting Defendants’ issuance of settlement funds, which are to be remitted within thirty (30) days. Out of an abundance of caution, Plaintiffs respectfully request that the Court retain jurisdiction over this action, or otherwise issue an administrative stay of the action, for forty-five (45) days, by which time Plaintiffs expect to file a voluntary dismissal of this action in its entirety.

Because the defendants in this action have not yet appeared, Plaintiffs are filing this notice unilaterally; however, prior to filing, the undersigned counsel contacted Defendants’ counsel, who consented to the filing.

Respectfully submitted,

DATED: October 17, 2025

**LAW OFFICES OF DALE K. GALIPO  
SUA LAW GROUP, APC**

By: /s/ Benjamin S. Levine

Dale K. Galipo

Brandon Sua

Benjamin S. Levine

*Attorneys for Plaintiffs*